

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION**

IAN L. LAND,  
an individual,  
Plaintiff,

Case No. 2:22-cv-12672-MFL-CI  
Hon. Matthew F. Leitman

V

RYAN RULOFF,  
City of Detroit Police Officer,  
Individually, and in his Official  
Capacities, and

MATTHEW WEBB,  
City of Detroit Police Officer,  
Individually, and in his Official  
Capacities, and

Defendants.

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**PLAINTIFF'S MOTION IN LIMINE NUMBER 1 TO BAR ARGUMENT  
OR EVIDENCE OR REFERENCE TO PLAINTIFF'S CRIMINAL  
CONVICTIONS OR ARRESTS**

NOW COMES the PLAINTIFF, Ian L. Land, by and through his attorneys,  
Law Offices of Ivan L. Land, P.C. moves this Court to enter an order consistent with  
the following motion in limine, and in support, states as follows:

I, Ivan L. Land, certify that this document complies with Local Rule 5.1(a)  
including double space (except for quoted materials and footnotes); at least one-inch

margins on the top, sides, and bottom; consecutive page numbering; and type size of all text and footnotes that is no smaller than 10-1/2 characters per inch (for non-proportional fonts) or 14 point (for proportional fonts). I certify that it is the appropriate length.

Pursuant to Local Rule 7.1, concurrence in the instant relief was requested from Defendants' Counsel, but no such concurrence was obtained.

### **I. Barring References to Convictions**

- 1) Plaintiff anticipates that Defendants will question Plaintiff and other witnesses about Plaintiff's convictions.
- 2) Upon information and belief, Plaintiff has the following convictions:
  - a. Possession of Marijuana; June of 2009; Troy, MI;
  - b. Obtaining a Pistol without a License; June of 2014; Wayne County, MI;
  - c. Operating While Intoxicated; February of 2016; Troy, MI;
  - d. Driving Under the Influence; June of 2021; Scottsdale, AZ
- 3) Federal Rule of Evidence 609(b) states that "Evidence of a conviction...is not admissible if a period of more than ten years has elapsed since the date of the conviction or of the release of the witness from the confinement imposed for that conviction, whichever is the later date..." Evidence of conviction would be highly prejudicial in this matter.

- 4) Clearly, Plaintiff's conviction is not applicable to Fed. R. Evid. 609(a)(2).  
There is no probative value admitting the actual conviction as it was unknown to Defendant Officers at the time of their interactions.
- 5) Only convictions which have probative value will be admissible. This only includes felonies and certain misdemeanor convictions that include an element of dishonesty or false statement. Plaintiff's convictions are not admissible for any proper purpose according to Fed R. Evid. 609 and 403.

**II. All Convictions, Arrests, and Law Enforcement Contact Are Not Admissible Under Fed. R. Evid. 404(b):**

- 6) Finally, there can be little question that any of Plaintiff's convictions, arrests are not admissible.
- 7) Plaintiff requests any argument, evidence or innuendo about Plaintiff's convictions or arrests be excluded.

WHEREFORE, Plaintiff respectfully requests that this Court enter an order barring above anticipated argument and/or evidence, and an order directing defense counsel to properly prepare their witnesses not to mention the above information.

Dated: June 13, 2025

Respectfully Submitted,

/s/Ivan L. Land

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**UNITED STATES DISTRICT COURT  
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IAN L. LAND,  
an individual,  
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Case No. 2:22-cv-12672-MFL-CI  
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**BRIEF IN SUPPORT OF PLAINTIFF’S MOTION IN LIMINE NUMBER 1  
TO BAR ARGUMENT OR EVIDENCE OR REFERENCE TO  
PLAINTIFF’S CRIMINAL CONVICTIONS OR ARRESTS**

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## **BRIEF**

NOW COMES Plaintiff, Ian L. Land, by and through his attorneys, Law Offices of Ivan L. Land, P.C., and submits this brief in support of his Motion in Limine to exclude references to his prior convictions, arrests, or law enforcement contact. In support thereof, Plaintiff states the following:

### **I. Convictions Exceeding Ten Years Are Inadmissible Under Fed. R. Evid. 609(b)**

Federal Rule of Evidence 609(b) bars admission of convictions if more than ten years have passed since the conviction or release from confinement. Therefore, any convictions older than ten years are automatically inadmissible under Fed. R. Evid. 609(b) and should be excluded. The only convictions that are less than ten years old are the alcohol related offenses in 2016 and 2021.

### **II. Convictions Lacking Probative Value Are Inadmissible Under Fed. R. Evid. 609(a)(2) and 403**

Plaintiff's alcohol related convictions are not a *crimen falsi* offenses and do not fall within the scope of Federal Rule of Evidence 609(a)(2). It lacks probative value as the 2016 offense was unknown to Defendant Officers at the time of the incident and 2021 offense occurred after the incident. Admission of these alcohol



related offenses would serve only to unfairly prejudice the jury and should be excluded pursuant to Federal Rule of Evidence 403.

**III. Arrests and Law Enforcement Contact Are Inadmissible Under Fed. R. Evid. 404(b)**

Plaintiff also seeks exclusion of any reference to prior arrests or law enforcement contact. Such evidence constitutes improper character evidence under Federal Rule of Evidence 404(b) and lacks any permissible purpose. It invites unfair prejudice and has no relevance to the underlying claims.

WHEREFORE, Plaintiff respectfully requests that this Court enter an order barring above anticipated argument and/or evidence, and an order directing defense counsel to properly prepare their witnesses not to mention the above information.

Dated: June 13, 2025

Respectfully Submitted,

/s/Ivan L. Land  
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**Attorney for PLAINTIFF**

## **CERTIFICATE OF SERVICE**

I hereby certify that I electronically filed the foregoing document with the Clerk of the Court via CM/ECF on June 13, 2025, to serve all parties.

Dated: June 13, 2025

Respectfully Submitted,

/s/Ivan L. Land

Ivan L. Land (P65879)